

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  
BIG LOTS, INC., *et al.*,  
Debtors.<sup>1</sup>

Chapter 11  
Case No. 24-11967 (JKS)  
(Jointly Administered)  
**Re: D.I. 13, 460 & 575**

**NOTICE OF FILING OF PROPOSED ORDER PURSUANT TO SECTION 363  
AND 365 OF THE BANKRUPTCY CODE AUTHORIZING THE  
DEBTORS-IN-POSSESSION TO TERMINATE OR ASSUME, ASSIGN AND SELL  
CERTAIN NON-RESIDENTIAL REAL PROPERTY**

**PLEASE TAKE FURTHER NOTICE** that, on September 9, 2024, the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Procedures to Sell Certain Leases, (II) Approving the Sale of Certain Leases, and (III) Granting Related Relief* (the “**Lease Sale Procedures Motion**”) (D.I. 13).

**PLEASE TAKE FURTHER NOTICE** that, on October 9, 2024, the Court entered the *Second Interim Order (I) Establishing Procedures to Sell Certain Leases, (II) Approving the Sale of Certain Leases and (III) Granting Related Relief* (the “**Second Interim Lease Sale Procedures Order**”) (D.I. 460).

**PLEASE TAKE FURTHER NOTICE** that, on October 18, 2024, pursuant to the Second Interim Lease Sale Procedures Order, the Debtors conducted virtual auctions (D.I. 497 & 502) for certain of the Debtors’ unexpired real property leases (the “**Lease Assets**”).

**PLEASE TAKE FURTHER NOTICE** that, on October 21, 2024, the Debtors filed the *Second Notice of Successful and Backup Bidder with Respect to the Auction of Certain of the Debtors’ Lease Assets and Assumption and Assignment of Certain Unexpired Leases* (the “**Post-Auction Notice**”) (D.I. 575), announcing the successful bidders for the Lease Assets.

**PLEASE TAKE FURTHER NOTICE** that, as previewed in the Post-Auction Notice, a hearing to consider approval of the sale, assumption and assignment, termination, or

<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

other disposition of the Lease Assets to the Successful Bidders at the Lease Auction, will be held before the Honorable J. Kate Stickles, at the Court, 824 Market Street, 5th Floor, Courtroom 6, Wilmington, Delaware 19801 on **October 31, 2024 at 12:00 p.m. (prevailing Eastern Time)** (the “Lease Sale Hearing”).

**PLEASE TAKE FURTHER NOTICE** that, at the Lease Sale Hearing, the Debtors will seek approval of the assumption and assignment, or termination, certain Lease Assets pursuant to an order, substantially in the form attached hereto as **Exhibit 1** (the “Second Proposed Lease Sale Order”).

*[Signature Page Follows]*

Dated: October 30, 2024  
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Sophie Rogers Churchill  
Robert J. Dehney, Sr. (No. 3578)  
Andrew R. Remming (No. 5120)  
Daniel B. Butz (No. 4227)  
Tamara K. Mann (No. 5643)  
Sophie Rogers Churchill (No. 6905)  
1201 N. Market Street, 16<sup>th</sup> Floor  
Wilmington, DE 19801  
Tel: (302) 658-9200  
rdehney@morrisnichols.com  
aremming@morrisnichols.com  
dbutz@morrisnichols.com  
tmann@morrisnichols.com  
srchurchill@morrisnichols.com

-and-

DAVIS POLK & WARDWELL LLP

Brian M. Resnick (admitted *pro hac vice*)  
Adam L. Shpeen (admitted *pro hac vice*)  
Stephen D. Piraino (admitted *pro hac vice*)  
Jonah A. Peppiatt (admitted *pro hac vice*)  
Ethan Stern (admitted *pro hac vice*)  
450 Lexington Avenue  
New York, NY 10017  
Tel.: (212) 450-4000  
brian.resnick@davispolk.com  
adam.shpeen@davispolk.com  
stephen.piraino@davispolk.com  
jonah.peppiatt@davispolk.com  
ethan.stern@davispolk.com

*Counsel to the Debtors and Debtors in Possession*